

# Kasell Law Firm

March 7, 2025

*via ECF*

Hon. Lara K. Eshkenazi  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Confirmation of Deposition Dates**

Magistrate Judge Eshkenazi:

I spoke with my client this morning *via* Zoom, and I write to confirm Plaintiff's availability for Defendants' deposition of Plaintiff scheduled for April 23<sup>rd</sup> at 10 a.m. and April 25<sup>th</sup> at 10 a.m. So that the issue need not be addressed during the deposition, I asked my client to send confirmation that he is in Portugal, and he sent me two pictures of him holding a paper up at a local store with a local paper. I will work with opposing counsel to assuage any other concerns she may have, and I look forward an efficient and smooth deposition and finding resolution of this dispute.

/s/ Brian Lehman

Brian Lehman  
Kasell Law Firm  
1038 Jackson Avenue, #4  
Long Island City, NY 11101  
(718) 404-6668  
david@merchancashdefense.com

*Counsel for Plaintiff*







